

# Public Financial Guidance Review: Proposal for consideration

## Citizens Advice response



## Executive Summary

Citizens Advice aims to provide the advice people need for the problems they face, and to prevent problems happening in the future. We are a national charity and we deliver advice services from over 2,900 community locations across England and Wales. We are the Charity Times Charity of the Year for 2015.

In the last year local Citizens Advice helped people with 1.8 million queries about debt and personal finances. Through our financial skills programmes we also help people to avoid money problems and gain knowledge, skills and confidence with money. We are also a partner in the government's Pension Wise service, and have delivered over 40,000 face to face guidance sessions for consumers considering pension choices.

Our research on the *Four Advice Gaps* identified key gaps in provision of advice and guidance as in Figure 1. The Financial Advice Market Review has taken welcome steps to address one of these - the affordable advice gap. This Public Financial Guidance Review presents an opportunity to address the other three gaps by helping more consumers access free support, with better referral mechanisms and meaningful outcomes.

**Figure 1: The Four Advice Gaps**



Consumers are not currently getting the support they need, despite significant investment in debt advice, money advice and financial capability services both through a range of levies and directly from Government, local authorities and private organisations. Unsecured household debt is expected to rise to around £300 billion by 2020 and over 13 million UK adults find managing money difficult. Arrears on bills are particularly concerning - they are the biggest problem debt we see at Citizens Advice and are not captured by ONS or Bank of England unsecured debt stats.

In this context, we welcome the government's proposals for the new public financial guidance bodies. We have consistently supported efforts to get money to the front line, which is at the heart of the new approach to money guidance. And we share the government's view that provision of pensions guidance through three separate bodies neither makes best use of resources nor provides optimal support to consumers.

Our evidence shows that both of the new guidance bodies must be designed around real consumer behaviours, needs and experiences. This approach must run through

all elements of design to ensure that consumers engage, that they benefit from their interactions (with funding targets focusing on this) and that resources are not wasted. Without doing this the lessons from the Farnish Review may not be learned.

### **Three key messages for this review:**

#### **● Consumer centred services**

The new money guidance body should commission providers to engage consumers at key life events (such as problem debt or having a child), when they are more likely to review their finances. Consumers should be able to access money and debt advice services that work well together and provide holistic support. This will tackle consumers' different (often linked) problems and help prevent future problems. Financial capability support should be provided alongside advice and guidance where appropriate, and warm handoffs should be provided to ensure that users can address different issues when they engage. The new body should commission partners, including large national organisations and local providers (such as in medical centres or faith groups) to ensure that it serves all consumers with the greatest need. The new money guidance body should work with MAS to ensure that consumers receive uninterrupted support during the transition process.

#### **● Pension guidance**

We support the proposal to combine the support provided by Pension Wise, MAS and TPAS into one new pension guidance body. This should be more efficient and can provide better support to consumers. The current multichannel access to pension guidance from the existing bodies and delivery partners must be preserved to ensure that all consumers can access support. Our evidence shows that consumers benefit from being able to choose the channel they feel most confident with or that fits best with their daily lives. Over 75% of Pension Wise appointments have been face to face in the last six months. Many consumers have complex situations so guidance should be tailored and offer warm handoffs where appropriate. As with money and debt advice, using key life events is crucial to engage consumers with their pensions. The creation of the new body provides an important opportunity to take advantage of more life events with structured sessions. Consumers should be able to use the service throughout their working lives (not just from 50) and should be able to access services more than once - particularly when their circumstances change.

#### **● Sector coordination**

We agree that the new money guidance body should have a role in commissioning research and policy, in improving standards and supporting debt advice infrastructure. The critical element here is that this must be carried out through sector collaboration and using the significant sector expertise and experience to drive and develop this area. It is essential that the new body has the skills and capabilities to shift to this approach.

**Figure 2: The importance of a multichannel offer - consumers' first two preferences for pension support**



In addition to the three key priorities above, the new bodies must also:

- **Engage with existing provision:** We support the proposal's emphasis on avoiding duplication, and the new bodies should build on what already exists. During the transition period they should also implement changes using the same approach - and not delay until 2018 - to ensure effective use of the levy funding.
- **Provide responsive guidance:** The guidance bodies should ensure that digital tools are provided for consumers which can be used both during and outside sessions. The new pensions body should also allow consumers to access more than one appointment, particularly when their circumstances change.
- **Offer effective referrals:** This includes effective warm handoffs, both between the pensions and money guidance bodies and with other service providers. The new bodies must also ensure that they collaborate and co-operate at all levels.
- **Use measurable outcomes:** Rather than funding media campaigns, they must focus on measurable, local and targeted work. Distance travelled measures will promote meaningful projects and deliver value for money.
- **Work in all UK nations:** Policy and research must reflect the different legislative, demographic and geographical profiles of all nations in the UK.

**Citizens Advice delivers pension guidance on behalf of the Department for Work and Pensions (DWP), under the Pension Wise brand. This document reflects the views of Citizens Advice as a consumer advocate and not the views of Pension Wise or DWP.**

## **Q1. Are there any specific guidance gaps in the current pensions guidance offering that you think the new body should fill?**

We share the government's view that the current provision of pensions guidance through three separate bodies neither makes best use of resources nor provides optimal support to consumers. So we welcome the proposals for getting more money to the front line to help consumers understand their pension choices.

Pension Wise has delivered guidance to over 60,000 consumers since it was launched in April 2015 and is providing a high quality service, with 9 in 10 users happy.<sup>1</sup> Its multichannel service offers consumers choice in how to access support, and is key to the guidance guarantee which ensures consumers can access independent, impartial guidance.

To build on this initial success, Pension Wise can be developed in at least five key ways to improve service provision to consumers as it transfers to the new body.

First, **consumers should be able to access more than one session.** This will help close the guidance gap for consumers who have already had one Pension Wise appointment. So, for example, a consumer who takes a guidance session as they approach eligibility for pension freedoms should also later be able to have another appointment. This could be shortly after to check their plans with an impartial guider, or some years later to review options if they deferred pension access. The latter will be particularly important when consumers have a significant life event - such as poor health or divorce - which may mean they have to review their pensions and other finances. These issues are being reviewed and we are working to support the development of the service to include additional features such as short or longer term follow up sessions.

Second, **sessions should be made more responsive to specific consumer needs.** This should include more tailored appointments, such as those for the secondary annuity markets. It should also include making more tools available during sessions to use in sessions to help consumers better understand their choices. The new body should approve tailored session content and tools that can be used to help consumers understand the key options and also the potential implications depending on different potential scenarios. These are being reviewed and we are working to support the development of the service.

Third, **Pension Wise should ensure that consumers can access tools outside sessions** to help them engage with pensions through their lives. We have been calling for the introduction of a pensions dashboard for some time,<sup>2</sup> so welcome the government's commitment to introduce one by 2019. Beyond this, the new body should introduce further tools to help consumers, such as:

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<sup>1</sup> Usage and satisfaction figures from the [Pension Wise dashboard](#), accessed 25 May 2016.

<sup>2</sup> See, for example, Citizens Advice, [Strengthening the incentive to save: a consultation on pensions tax relief](#), 2015.

- **An overall options comparison tool.** Currently clients are given a verbal account of the options they have available to them and an indication of monetary values. We believe a tool, which uses a range of standardised *indicative* variables (such as annuity rates and marginal tax rates) along with information presented in a comparison-site style will enable clients to better understand the implications of different options and therefore make a more informed choice as to which options are best for them. We include an illustration of what this could include in Annex 1 at the end of this response.
- **A drawdown comparison tool.** The annuity comparison tool<sup>3</sup> currently provided by the Money Advice Service (MAS) works well, and a similar tool should be introduced for drawdown products to reflect the new market created by pension freedoms. The current lack of a reliable comparison tool makes it hard for consumers to shop around: our upcoming research shows that consumers are considerably less likely to shop around for drawdown than for annuities.<sup>4</sup> Many consumers simply don't have the energy or know how to compare prices through individual providers. This may increase consumer risk of falling prey to scams through other websites.
- **Improved IFA directory.** We strongly welcome the government's work to support financial advice at new price levels with simplified advice and robo advice through FAMR. These will help more consumers benefit from tailored recommendations. However, our evidence shows that addressing price alone is not enough to help more consumers benefit from advice. Trust is a key barrier for consumers, and although the current IFA directory<sup>5</sup> is good start, it should be improved to help consumers make choices more confidently and to move on from guidance to advice. The new body should support a more responsive tool with clearer pricing information and feedback from other consumers to boost confidence.<sup>6</sup>

Fourth, **the new body should take pension support to consumers**, rather than expecting them to come to it. All of our evidence shows that consumers struggle to engage with pensions throughout their lives, even at the point where they are accessing their pensions. Our upcoming research finds that almost a third of consumers accessing their pots since April 2015 have not sought any help with their choices, rising to almost half of those with household incomes below £20,000.<sup>7</sup> Citizens Advice has been trialling proactive promotion of the Pension Wise service with local communities and employers (at national and local levels). The new pensions body should build on this to close the free advice gap.<sup>8</sup> Automatic enrolment creates more opportunities for guidance services to engage directly with clients throughout

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<sup>3</sup> See MAS, <https://comparison.moneyadviceservice.org.uk/en/Annuity/FindAnnuity/YourDetails>

<sup>4</sup> Citizens Advice, Drawing a Pension, June 2016.

<sup>5</sup> See MAS, <https://directory.moneyadviceservice.org.uk/en>

<sup>6</sup> Citizens Advice, [Affordable Advice](#), October 2015.

<sup>7</sup> This group did not take formal support (such as guidance or advice) or informal support such as speaking to friends or following the media. Citizens Advice, Drawing a Pension, June 2016.

<sup>8</sup> Citizens Advice, [The Free Advice Gap](#), November 2015.

their working lives, so the new body should also explore how it can work with NEST and other providers to engage consumers with guidance.

Fifth, **referral onto other services should be improved**, including for support with other pensions issues. Our research found that around 3.4 million people who have raised money issues with a trusted professional don't receive advice or a referral, and thus fall into the 'referral gap'.<sup>9</sup> As shown in Q2 below, seven in ten clients asking Citizens Advice for help with their private pensions also seek support with other issues. While we are well placed to offer additional support ourselves or to provide warm referrals, other bodies may not have the expertise or capacity to do so. As we explain in Q8, to close the referral gap the new body should ensure that clients are given warm handoffs to additional pension-related and other support.

## **Q2. Are there any pension-related topics that shouldn't be included in the remit of the new pensions body?**

Our evidence from the Citizens Advice network shows that consumers often face many issues simultaneously. As Figure 3 below shows, almost seven in ten (69%) clients we see through our standard Citizens Advice service with issues about personal pensions also have at least one other issue they want help with, including financial services and capability (39%) and benefits and tax credits (37%). Separately, we know that more than one in five clients we see for Pension Wise sessions want additional support from Citizens Advice following their session, and on average these people have more than four different issues they need support with.<sup>10</sup>

Our qualitative research shows that consumers often think of Defined Contribution pensions holistically as part of an overall and dynamic pensions income.<sup>11</sup> So consumers will be best served if the new pensions body can cover a wider rather than narrower range of issues. However, with the range of additional issues linked to pensions such as those in Figure 3, it is important to be clear on exactly what areas the new pension guidance body is expected to cover. We believe that the new body should be able to offer more detailed guidance when clients have specific pensions related questions, as highlighted in our responsive sessions point in Q1. This could involve information about the impact on debt or welfare of accessing their pensions in different ways. To avoid duplication and an excessive burden on pension guiders however, the new body will be most effective if it offers warm handoffs to other guidance services when consumers need additional specific advice. We address the issue of warm handoffs in detail in Q8.

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<sup>9</sup> Citizens Advice, [The Referral Gap](#), January 2016.

<sup>10</sup> Cluster analysis of Citizens Advice management information.

<sup>11</sup> We found that DC pensions are often merged in consumers' minds with DB pensions, state pensions, a partner's pension, property, savings and expected inheritance. See Citizens Advice, [Approaching Retirement](#), December 2015.

**Figure 3: Citizens Advice clients with private pensions issues who also want support in other areas<sup>12</sup>**

Additional issue	Percent of private pension clients with this additional issue
Financial services & capability	39%
Benefits & tax credits	37%
Debt	9%
Employment	8%
Housing	5%
Tax	5%
Relationships and family	4%
Other <sup>13</sup>	16%
All	69%

Both the content and the delivery of guidance are essential for consumers. Guidance is only effective if it is delivered in a way that suits specific consumer needs. This means that the multichannel offering at the heart of the guidance guarantee must be maintained to support consumers with different needs including face to face, telephone and online support. Our research showed that 71% of consumers aged 50+ with DC savings would choose face to face support as their first preference when considering their pension options.<sup>14</sup> This is borne out in practice: Pension Wise data in Figure 4 shows that in the past six months over three quarters of appointments have been face to face, emphasising the importance of a multichannel offering.<sup>15</sup>

The combination and complexity of pension choices mean that many consumers want face to face support, with some trusting this more and others feeling more confident to ask for clarification on key points. Other consumers prefer being able to use the phone service to avoid travel or because they feel more comfortable discussing personal finances on the phone. These different approaches show the importance of guidance services fitting in with consumers' lives, and this can only be properly achieved with a multichannel offering.

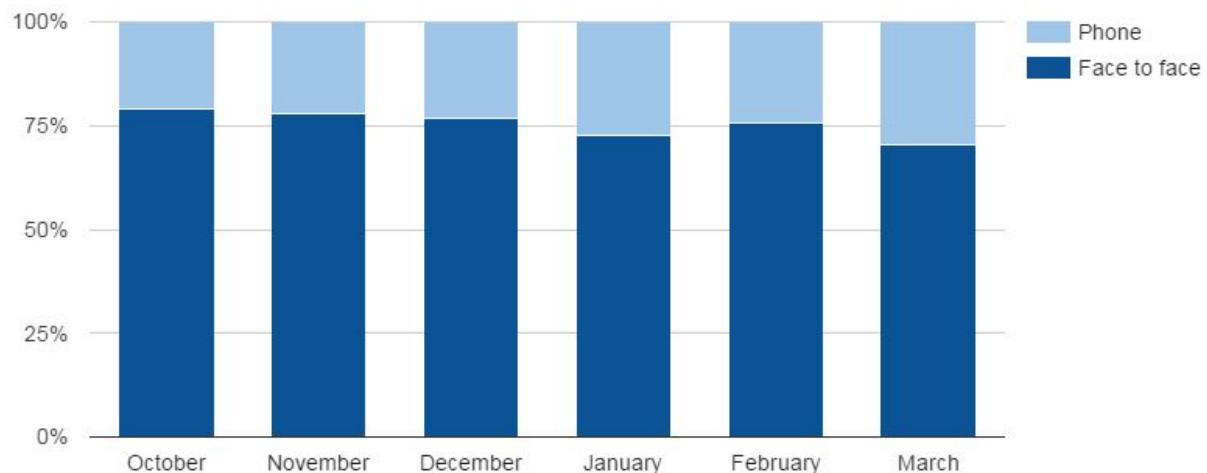
<sup>12</sup> These figures are from Citizens Advice management information for 2015/16. They do not include Pension Wise appointments. Some consumers have multiple different issues so are counted under more than one additional issue.

<sup>13</sup> This includes issues such as consumer goods and services, legal, utilities and communications, and health and community care.

<sup>14</sup> Based on a survey by ComRes for Citizens Advice of 1,386 UK adults aged 50 or over who are not yet retired Ranked within top two preferences. The full list of options was: face to face, on the phone, on a website, on email or live chat, on a video chat, or not wanting advice.

<sup>15</sup> Pension Wise dashboard <https://www.gov.uk/performance/pension-wise> accessed May 2016.

**Figure 4: Multichannel use of Pension Wise, October 2015 to March 2016**



The way the new pension body functions to deliver a multichannel offering will be important. It should use similar principles to the new money guidance body focused on: avoiding duplication of services, using delivery partner expertise where available (rather than delivering all services itself), and getting money to the front line to support consumers. This is particularly important for pensions as inertia means many consumers don't engage at all during their working lives.<sup>16</sup> Diverting more money to front line, with better referral from other services, will help address this.

Given consumer inertia and lack of trust, the power of brand can be important. Our research shows that low trust in financial services can deter consumers from shopping around for pensions and from seeking advice or guidance.<sup>17</sup> Access to familiar, trusted brands can address these concerns and help more consumers engage with their pensions.

With this in mind, lessons from the Farnish Review should be built into the design of the new pension guidance body. For example, the low level brand recognition for MAS (around 5-10%) despite large investments in promotion shows how hard it can be to engage consumers. Similarly, the Review questioned why MAS sought "*to compete with the wide range of other bodies who already have trusted brands and extensive consumer reach*".<sup>18</sup> The new pensions guidance body should learn from this. Pension Wise has established a strong brand in its first year, but it should also seek to harness the power of other existing consumer brands. This is another benefit of using existing, trusted consumers bodies as delivery partners where appropriate.

We know from our experience delivering Pension Wise that many consumers benefit from referrals for additional support - almost one in four (22%) of the Pension Wise clients that we have helped have booked a follow up session with Citizens Advice

<sup>16</sup> Citizens Advice, [Approaching Retirement](#), December 2015.

<sup>17</sup> Citizens Advice, Drawing a Pension, June 2016.

<sup>18</sup> HMT, [Review of the Money Advice Service](#), March 2015.

outside the scope of Pension Wise. This ensures consumers have access to simple, holistic advice.

By adopting similar approach to money guidance, the pensions body can ensure good support for consumers. It should also co-operate in areas such as research, data and how to commission services. We return to these issues in more detail in Q11.

### **Q3. Will these objectives focus the activities of the new money guidance body sufficiently to allow it to improve consumer outcomes?**

The three proposed objectives of the new money guidance body should be included in the remit of the new organisation. This should include reference to taking a strategic and long term view of identifying gaps, drawing on research agreed by sector collaboration similar to the development of the Financial Capability Strategy. Third parties must be selected in accordance with government regulations that ensure quality of service and client outcomes. These selected organisations should be delivering the free, independent and impartial debt advice at the heart of the government's guidance guarantee. A benefit for the new body of collaborating with the sector is that it will be able to draw on local expertise to complement devolved approaches, such as working with the Welsh Government's Information and Advice Quality Framework in Wales.<sup>19</sup>

We would also welcome the new money guidance body retaining some elements of a sector quality role that sets standards in certain areas (with more detail than the FCA principles), and providing guidance on good practice across the whole range of debt advice provision. Peer review, individual accreditation and maintaining a quality standards framework should remain: it is the way that this is done that should change from MAS' current approach. The new body should be more collaborative, have a sector wide panel steering its work, and address issues identified by the sector.

### **Q4. What role do you think the new money guidance body should have in providing research?**

The new money guidance body must ensure that it has good quality evidence to make sound commissioning and quality standards decisions. It should take the role of commissioner of research, using a panel of external independent and sector experts, including recipients of current delivery funding. The panel should ensure that funding is spent on priority areas. This should include identifying the groups most in need and funding services that are proven to help them, as we expand on in Q9.

The new body should provide a framework for measuring impact and require guidance providers to do the same. We address this issue in more detail in Q7. To ensure that resources are still focused on the front line, it should take a consistent approach building on existing good practice.

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<sup>19</sup> Welsh Government, [Information and Advice Quality Framework for Wales](#), March 2016.

Research should also be conducted to improve delivery of frontline services. We know there is widespread evidence on the need for financial capability to help improve long term consumer outcomes. What is not clear yet though, is how we can improve the long term outcomes of financial capability by changing our service interventions. So the new guidance body should fund key research and fund evaluation (outside standard commissioned services) to enable the guidance sector to test new ways of delivering services and understand what works.

We therefore support the concept of the recent initiative announced by MAS on the 'What Works Fund'. However, although we would support this in the new body, we have short term concerns about how this is being executed by MAS. This area requires a long term view, which the new body can take. For this year, we believe the programme should be conservative in terms of emphasis on innovation given the context of changes to MAS and funding plans post-March 2017. The programme should also be careful not to duplicate what exists already. For this year, the programme must prioritise building on existing interventions, ensuring these are evaluated before the sector moves on to new things. We would also support research that will explore how debt advice builds financial resilience, which is a major gap in sector knowledge.

The research funded by the new money guidance body should be limited to that which will help inform its commissioning of debt and money guidance. It should not fund or undertake policy research, which would duplicate activity undertaken by the three large debt charities, and others, under their advocacy remits.<sup>20</sup> The Farnish Review raised the benefit of using existing research being conducted by debt charities, consumer bodies, retail intermediaries and others. It recommended that "*MAS should strengthen its relationships with all these players, particularly those with direct consumer reach.*"<sup>21</sup> By doing this, the new guidance body can act as a streamlined hub to promote discussion of existing policy research and good practice with its own research commissioning.

Research must include adequate sample sizes for each of the home nations to allow separate analysis for England, Wales, Scotland and Northern Ireland in addition to UK-wide analysis. This will recognise different demographic and geographical profiles of each nation and how such factors will affect both demand for and access to services - ranging from Welsh language provision to differing internet speeds in different parts of the UK.

One of the strengths of the individual Financial Capability Strategies developed by MAS is that each strategy is based on robust nation-specific evidence. For example, the 2015 Financial Capability Survey included 795 interviews conducted in Wales.<sup>22</sup>

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<sup>20</sup> See, for example: *The State of Debt Collection*, Citizens Advice, 2016; *Changing Household Budgets*, Money Advice Trust, 2014; *The Credit Safety Net*, Stepchange, 2016.

<sup>21</sup> Christine Farnish, [Review of the Money Advice Service](#), December 2014.

<sup>22</sup> MAS, [Financial Capability in Wales 2015](#).

## **Q5. Would limiting providers of debt advice to FCA authorised firms rule out any types of provider?**

The FCA currently authorises organisations to provide debt advice and has a process for new providers of regulated activities in debt advice to become authorised. It also operates a sandbox initiative which provides a mechanism for new and innovative ideas to operate outside the normal regulatory regime. Whilst entry to the scheme is not guaranteed, it does provide a way for new entrants or services to enter the market.

We believe that the FCA regime of authorisation should be applied to all providers of debt advice and therefore to all those providing commissioned services, as there are no significant barriers for entry (for services or providers).

There is a difference in regulation in some areas of debt advice, where Independent Voluntary Agreement (IVA) providers are not regulated by the FCA. We have some concerns about this and have been working with the Insolvency Service on its review. We believe that the quality of advice and client experience can be poor when transferred from the regulated sector to an IVA provider. Whilst this is not universal, we would have strong concerns if commissioning of services included IVA providers under their current regime.

We also believe that the new body should go further than the FCA principles in ensuring good quality advice services. Schemes developed by MAS - such as the accreditation framework and peer review - should be reviewed with sector stakeholders. This work aims to develop and share best practice, as well as checking it, across the sector. Although this is less important for larger providers with membership schemes and audit processes, it is critical to maintaining quality for clients both of smaller independent organisations and of organisations offering debt advice alongside their main business (such as housing associations).

## **Q6. How could the new money guidance body work with the debt advice providers most effectively to ensure that their expertise is captured and informs contract design?**

Just as we welcome the commitment to direct more funds to the front line, it is also important that the new guidance body works with providers on the front line to capture their expertise and experience. Regular, early engagement with existing debt advice providers is essential to ensure commissioning focuses on what works for clients and enables strategic, well-managed development. We would like to see the new body adopt a range of ways to engage, which learns from and builds on MAS' previous engagement in this area including:

- Regular bilateral meetings at strategic and operational levels.
- A forum for providers of commissioned debt advice.

- Leading debt advice sector providers steering group.
- Debt advice steering group including creditors, regulators and debt advice sector representatives and direct consumer input.

These should be run through established groups wherever possible, such as the Money Advice Trust partnership board and the three debt charities group.

The most critical aspect of this engagement is how it is approached. Funding and delivery should, of course, be accountable to the commissioning body. Alongside this, the engagement approach must recognise the expertise within established debt advice organisations. Engagement should develop the ability of the sector to self-organise and be led by the issues that providers and independent research identify. The new body and stakeholders should draw up a set of principles around how sector expertise will be used.

The ability to achieve this is dependent on the skills and capabilities of the staff in the new organisation, and the culture it develops. It is essential that the new organisation has people who have knowledge of the sector at the top of the organisation, as well as within the staff group. We would welcome the new organisation having a clear set of behaviours and believe that the approach should be one that focuses on being:

- Consultative, achieving sector consensus, including managing conflict.
- Solutions focused, drawing on the expertise of the sector.
- Evidence based in decision making.

## **Q7. How do organisations currently monitor outcomes? Do you have any suggestions for the outcomes which should be monitored?**

At Citizens Advice we have over ten years' experience of outcomes monitoring, and are recognised as a sector leader in outcomes and impact evidence.<sup>23</sup> We have developed a set of shared outcome measures for all areas of advice and education, to support consistent reports of our impact across our network. This includes a set of meaningful financial capability measures addressing both knowledge and behaviour of clients. It has been developed with sector experts and clients, and fits within the UK Financial Capability Strategy framework.

Outcomes should be monitored on at least two levels. High level measures identify *whether* any change has occurred such as asking a client 'to what extent is your problem resolved?'. These can be used in all services, providing shared measures regardless of nature of intervention, channel, work level or advice area. The second level measures *what* change has occurred. These can be broadly split into advice outcomes and client outcomes:

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<sup>23</sup> For example, we were awarded Charity Times Charity of the Year award in 2015 in recognition of our outcomes data. See <http://www.charitytimes.com/ct/charity-times-awards-winners-2015.php>

- **Advice outcomes** capture how the problem has been resolved and, at their simplest binary, whether a solution been reached or not. This could include a debt being written off or successfully rescheduled, for example.
- **Client outcomes** are more nuanced and seek to capture broader changes to a client's life, such as wellbeing and confidence. In money guidance we measure how far the client has been equipped to deal with their future finances. This requires the use of 'distanced travelled' measures, allowing us to measure change in a credible way. Distance travelled methods identify client capability and needs, which can tailor the intervention to be most effective. Progress can subsequently be measured using the same methods.

Outcome monitoring must be appropriate, meaningful, proportional and timely. At Citizens Advice we successfully deliver outcomes evidence for government contracts using this approach. The new guidance body should not create a whole new industry to measure the impacts of guidance, but equally it has a responsibility to ensure it is delivering value for money. This means that the new regime should include specific and sufficient funding for outcome monitoring. It should be allocated to support monitoring that is:

- **Appropriate:** outcomes are only appropriate to be measured if the service being commissioned or delivered can be reasonably expected to achieve that change. So financial capability outcomes should only be measured on debt advice, for example, if the provider has been provided funding to address financial capability as well as debt. Delivery providers should also be appropriate in terms of which clients' outcomes they measure.<sup>24</sup>
- **Meaningful:** well defined consistent outcomes alone may not be sufficient to make a judgement on a service's efficacy. The complexity of a problem and the capability of the client must also be understood in order to consider value, which is where a distance travelled approach becomes important.
- **Proportional and timely:** outcomes can normally only be identified after an intervention, which requires follow up with the client. This is a resource intensive process, and requirements for continuous monitoring could place an unreasonable and disproportionate burden on service delivery organisations.

To achieve and measure long term outcomes in money guidance the new body should include financial capability alongside debt at both commissioning and impact levels. Without this, it is likely that many clients will not see significant long term improvements in their financial wellbeing.

## **Q8. How could "hand off" arrangements be most effectively built into contracts?**

The Citizens Advice network works in partnerships and has good referral relationships with many agencies. Where these work well, there are three main features:

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<sup>24</sup> They should use their experience and discretion to determine whether some of their most vulnerable clients should be enrolled onto any outcomes measurements and find other ways to measure these clients if possible.

- **Relationship management:** advisers or referring agencies are very familiar with and trust the agency they are referring their client to. This is both in the identification of the appropriate referral and in the 'selling' of the referral to the client. This often underestimated ongoing function requires resourcing.
- **Focus on client experience and outcomes:** this is essential to ensure that appropriate referral arrangements are identified for each client. The client's experiences and end point must always be at the centre of design, and this should be built into impact measurement.
- **IT supports the process:** data sharing has been notoriously difficult to achieve in the advice sector, both in terms of staying within data protection or consent rules, and in the cost and implementation of developing appropriate IT. Where this has been resolved, clients do not have to repeat their stories, and the process is much more efficient for the agencies involved.

Within the current MAS funded contract, we are required to ensure appropriate referrals are in place for each participant. The FCA also requires authorised firms to have a referral policy which regularly reviews partnerships and appropriateness of referrals. We have mainly encouraged local participants to establish these relationships and draw on local resources (such as a law centre, women's' refuge or support group).

The sector could clearly benefit from stronger hand offs between the larger debt advice charities, and some national referral arrangements. It has been difficult to find a solution however, and this needs to come from the sector itself rather than contracting arrangements. This is due to the commercial nature of some referral arrangements, as well as the need to co-ordinate referrals more widely than recipients of statutory levy. Citizens Advice is currently working on a project with StepChange Debt Charity and Money Advice Trust looking at the customer journey for clients in debt and how the three largest debt advice providers can work together to use each other's strengths.

We would welcome any support that the new organisation can give to the development of this work.

For debt advice providers funded by the statutory levy, any references in contracts to providing referrals should consider the impact on the above ongoing work. It is also important to be aware than any national or large volume referral arrangements would need to be specified by the commissioner or we would have to undertake a commissioning process. We would strongly support keeping support for local arrangements were these meet local client needs, as these often incorporate holistic solutions. Contracts specifying these referrals would also need to address and include robust referral mechanisms such as IT and data transfer, with associated resourcing for this infrastructure.

## **Q9. How should the new money guidance body seek to understand the gaps in the provision of money guidance?**

The new money guidance body should have a sound understanding of existing provision and which groups are served. As discussed in Q4, the new money guidance body should fund research to inform its commissioning strategy. This should include understanding which groups are most in need of money guidance, what barriers they face to accessing guidance and which interventions are most effective.

A review of existing services across the UK would be an excellent starting point in ensuring that known interventions have been mapped and evaluated before making commissioning decisions. We recommend that this work ties in with mapping already undertaken planned or undertaken to avoid duplication. For example, the Welsh Government's National Advice Network has recently undertaken mapping of information and advice provision across Wales and has committed to keeping this updated. This should be built on rather than duplicated.

#### **Q10. Is the planned focus on local and digital financial capability raising projects the right one?**

As a charity that operates from 2,900 locations at the heart of communities across England and Wales, Citizens Advice is keenly aware of the value of focusing on local projects. And as a provider of a website with over 36 million visits a year, we know the importance of digital support and digital financial capability. Our evidence shows that consumers benefit most from a multichannel service: some consumers prefer specific access channels for all types of support, while many others prefer using different channels for different issues. This is also true of financial services themselves. For example, whereas 20% of consumers prefer to manage transactions with a bank in person, more than half (51%) want face to face support when seeking financial advice or planning support from a bank.<sup>25</sup>

Citizens Advice believes that while use of digital technology has expanded greatly in recent years, it still has significant untapped potential to improve financial capability in the UK. Well designed, intuitive and integrated digital tools can help individuals track everyday spending, set savings goals and budget. Calculators and other tools targeted at consumers who are at particular life stages or who are using particular financial products or services (like a mortgage) can enable them to undertake relatively complex financial modeling, improving their understanding and decision making. Citizens Advice also supports the Open Banking Standard and recognises the potential for Open APIs to further enhance the role of digital technology in building consumer financial capability. As the case study below makes clear, it is essential that developments in technological offers to support financial capability are also matched with support to help more consumers improve their digital capability.

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<sup>25</sup> Social Market Foundation, [Clicks and Bricks: Understanding how consumers manage their money](#), January 2016.

The approach to developing digital tools and apps outlined in the review largely mirrors our own approach to developing digital services. Citizens Advice's digital design principles state we will:

- **Start with people's needs.** Design should be based on people's needs, which are in turn based on their problems and capability.
- **Design with data and research.** Every decision should be informed by research, such as content, CMS development, design and usability. This research should be detailed and involve real people who are likely to use the service.
- **Help people solve problems.** Design should identify problems through research and solve them with advice. It should not just give information or explain the law without solving problems. Rather it should make content active and actionable.
- **Give practical and tactical advice.** At Citizens Advice we use our local and national service staff to inform design. As well as user testing with clients, we also learn from advisers and subject matter experts.

### Digital Case Study: Digital Money Coach (DMC) Pilot

Digital Money Coaches are volunteers who work with Citizens Advice clients to improve their digital skills and, by doing so, build their financially capability through using online and mobile banking, price comparison sites and energy switching sites. Money Coaches also provide 'assisted digital' support - helping clients complete specific tasks online. This activity includes, but is not restricted to, job searches, accessing and managing welfare benefit accounts, bidding on social housing and making complaints.

This project aims to help those who have not used the internet at all as well as those who have not used it for financial tasks before. More than one in five (21%) DMC clients reported they had never used the internet before taking part in the project and one in three (33%) indicated they had not previously completed any of the digital tasks online.

Fewer than half of the DMC clients (46%) have access to the internet on a computer, laptop or tablet in their home. This includes just over 1 in 5 DMC clients who indicated they did not have access to the internet at all (22%).

Our pilot achieved the following client outcomes:

- 60% of clients said they now feel more able to use digital technologies and the same proportion said they had made changes to the way they use digital technology since using the service.
- 41% of clients said they now feel more able to manage their finances. 38% had made changes to the way they manage their finances since using the service.
- 89% of clients rated the service as good or very good and 84% said they were likely or very likely to recommend the service to others.

We also welcome the plan for the new money guidance body to fund local projects to raise financial capability. The intention not to define local, enabling projects of any size to be funded will help ensure that a coherent range of quality assured work emerges, and it fits well with the approach we have taken at Citizens Advice. Our financial capability work is delivered at a local level by our network and supported by a national team of subject matter experts who produce quality assured financial education resources, an evaluation and impact framework and pilot new approaches. This results in the delivery of high quality, evidence led interventions that are tailored to fit with local needs.

We also recognise the importance of local solutions through our work managing Financial Capability Forums across England and Wales. We run these fifteen regional forums to commission services from local Citizens Advice and other local organisations with a track record in financial capability delivery. In 2015/16, we used the forum network to disburse funds to 168 organisations.

### **Targeted support Case Study: Quids In - financial skills training for social housing tenants**

Over a ten month period, Bedworth, Rugby and Nuneaton Citizens Advice (BRANCAB) delivered short financial skills training sessions free-of-charge to tenants of Orbit Heart of England Housing Association (OHE) living in Rugby and Stratford. The aim of the training was to enable tenants to maximise their available income, help them access and use appropriate financial products and in turn avoid financial difficulties. 150 social housing tenants participated in one-to-one financial capability training sessions.

#### **User Demographics:**

- 70% female, 30% male.
- 38% aged 25-45, 39% aged over 45.
- 66% lived in households with no earned income.
- 52% lived in households with total income less than £200 per week.

The Personal Finance Research Centre at the University of Bristol conducted an independent review of the project, which was designed to demonstrate whether or not any benefits gained by tenant learners could be attributed to the training. It conducted before and after surveys with both tenant learners and a comparison group of tenants who lived in areas where the training was not available.

#### **Impact:**

- 28% of tenant learners started budgeting, compared with 2% of the comparison group.
- Tenant learners were **six times** more likely to be achieving financial benefits than the comparison group.
- Tenant learners were on average **£10 a week better off** as a result of their actions.
- 71% of tenant learners reported a positive change in financial confidence, compared with 13% of the comparison group.
- 41% of tenant learners felt less worried about money after the session.

## **Q11. What should be included in the partnership agreement between the two bodies, and how could hand-offs best be specified?**

The new pensions and money guidance bodies should have substantial links to ensure that they can co-operate in areas of common interest and, crucially, promote effective referral between their respective consumer-facing services. It is important that they adopt a coherent approach both at senior and operational day to day levels.

The example of FCA and the Prudential Regulation Authority (PRA) is not entirely analogous but does provide a useful comparator when considering how the two new guidance bodies should work together. For example, it is important that the new bodies co-operate in some areas and co-ordinate in others. We set out areas below where the two bodies should formally agree to share information and resources to support consumers.

- **Consistent consumer experience:** The FCA and PRA work together to ensure that dual-regulated firms can be confident in dealing with two different organisations. Similarly, it is important that consumers using services from both guidance bodies can expect consistency when they have overlapping or concurrent money and pensions needs.
- **Joint research and work programme:** The guidance bodies should work together on areas of common interest such as how to improve consumer engagement and how to effectively measure outcomes. The two bodies should agree a joint work programme and subsequently collaborate to implement their findings.
- **Consumer protection:** The two bodies should coordinate to protect consumers from threats such as scams. This should include sharing early warning signs to identify emerging issues as well as consistent messaging to help raise consumer awareness of how to identify and deal with potential scams.
- **Good practice and shared process:** The two guidance bodies should ensure they are using similar definitions of, and approaches to, guidance. As with research above, they can share good practice in how good guidance sessions work and how to measure impact. As discussed in response to Q8, it is also important that they take similar approaches to commissioning services and this can help avoid duplication.

The two new guidance bodies should embed relationships at all levels. They should use memorandums of understanding to clarify their relationship where appropriate, as the FCA and PRA do. In addition, they should promote a common culture by adopting a shared set of corporate behaviours for staff. These measures will help the guidance bodies work more efficiently and effectively to support consumers. They should also seek to embody this on practical levels, such as hosting shared events and running joint campaigns where appropriate.

At Citizens Advice, we have established secondments with other organisations such as the DWP and FCA whose client bases and interests overlap with our own. We have found this to be an excellent way of ensuring that intelligence and good practice can be shared across institutions to support outcomes for consumers and service users. The two guidance bodies should consider using secondments to embed a common culture and co-ordinated working.

As well as having strong links with each other, the two guidance bodies should also establish close relationships with key stakeholders in their respective fields. For example, the new pensions guidance body should consider having a partnership or board arrangement with the DWP's private pensions team to ensure that their work links up.

### **Q12. Do you have any other comments on the proposed model?**

It is important that both guidance bodies recognise real world consumer behaviour and ensure that resources are spent effectively to support better outcomes for consumers and better value for levy funders. Both guidance bodies must ensure that consumers can access their services with a multichannel approach, such as face to face, telephone and online services. This should be supported by targeted proactive work in local areas and with employers.

The two bodies should build on the good practice established in the Pension Wise service, which has had a successful first year. The service has been effective thanks to careful user design involving delivery partners.

Both guidance bodies should ensure they have the right people with the necessary skills and capability to deliver meaningful support and protection for consumers. As well as paying enough to attract appropriate candidates, they should also avoid paying excessive wages to staff which would risk undermining confidence in their organisations. They should also pursue credibility and openness in other areas, such as being clear about how funding is allocated and its efficacy.

### **Q13. Would these proposals have any impact on delivery of public financial guidance in Scotland, Wales and Northern Ireland?**

Citizens Advice is the national association representing local offices in England and Wales. Citizens Advice Scotland and Citizens Advice Bureau Northern Ireland are separate associations operating independently in their respective nations. We use our common interest and shared history to support clients across the UK. For some services, such as Pension Wise, we deliver services individually but broadly to a comparable model which is tailored to the specific characteristics of each nation, but for some wider projects such as delivering services under our statutory consumer functions and for our website we work together closely.

The new money guidance body must recognise the different policy landscapes in England, Wales, Scotland and Northern Ireland when setting objectives and developing annual business plans. This is the best way to ensure that consumers in all areas receive the support they need.

We note the government's intention to build on MAS' knowledge base in forming the new money guidance body. With that in mind we believe it will be critical to also build on MAS' approach to cross-nation working within the UK. This includes developing specific business plans for each of the home nations to ensure the proposed new delivery model does not result in a reduced money guidance service for consumers in Wales, Scotland and Northern Ireland. It also includes retaining a strategic presence in each of the home nations to ensure effective links are made between work being undertaken by the new body and the different policy landscapes across the UK.

Existing or future legislation in each nation can affect the provision of money advice and guidance services, such as the legal duty placed on certain public bodies in Wales to develop and produce a child poverty strategy and local wellbeing plans.<sup>26</sup> Citizens Advice Cymru has consistently emphasised how, when undertaking local assessments and developing such plans, the Welsh Government and local authorities must recognise how access to independent advice services and proactive financial education contribute to people's wellbeing.

We would welcome the high level UK Money Advice Service Financial Capability Strategy continuing to provide the overall direction for this work. It is very high level however, and we look forward to collaborating with the new body to take this strategy forward into practical application.

While that initial strategy was being developed, Citizens Advice advocated for separate action plans for each of the UK nations to take account of the different policy and legislative contexts, and we welcome the fact that separate strategies and action plans have since been launched in each nation. The MAS Financial Capability Strategy for Wales was developed in an engaged and inclusive way with a wide range of partners. The Strategy was also developed in parallel with the Welsh Government's Revised Financial Inclusion Strategy (March 2016), which has a wider remit. As a consequence the work being undertaken by MAS in Wales has in effect been adopted by the Welsh Government to cover this element of their work.

The Wales Financial Capability Strategy includes over 70 recommended actions, the majority of which relate to specific Wales-focused activity. The strategy also makes reference to a wider range of Welsh Government strategies and programmes of activity which may or will have a bearing on activities in Wales that are designed to improve consumers' understanding of their finances as well as their ability to manage in times of financial difficulty.

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<sup>26</sup> These come from the Children and Families (Wales) Measure 2010; and duties placed on many of the same public bodies under both the Social Services and Well-being (Wales) Act 2014 and the Well-being of Future Generations (Wales) Act 2015.

#### **Q14. What kind of tools and products do consumers most often use or ask about?**

Through our website - [citizensadvice.org.uk](http://citizensadvice.org.uk) - we helped people with over 36 million visits in 2015/16. In that period, our debt and money content was viewed 7.1 million times. Views of our financial product pages have risen 83% in the last year and views of pages relating to debt are up by 17%.<sup>27</sup>

Our online content covers many relevant areas for this review including pensions, debt, savings and borrowing. Figure 5 shows the most common areas where people sought support from our website the last year.

**Figure 5: Most visited pages of Citizens Advice debt and money online content<sup>28</sup>**

No.	Topic	Total number of page views in this topic	Most visited section within this topic
1	Bailiffs	1,074,572	Can a bailiff force entry into your home
2	Bankruptcy	831,094	Bankruptcy - what you need to know
3	Debt relief orders	433,807	Debt relief orders - what you need to know
4	Individual Voluntary Arrangements	205,586	Checklist: is an individual voluntary arrangement right for you
5	Types of borrowing	184,831	Hire purchase and conditional sale
6	Types of pension	164,658	Workplace pensions
7	How to sort out your mortgage problems	163,283	Help with mortgage costs if you're out of work
8	Debt management plans	150,047	Debt management plans - what you need to know
9	Types of insurance - Vehicle insurance	148,748	Making a claim if you're in an accident
10	How to dispute a credit debt	147,952	How to dispute a debt

We research the needs of our clients and potential clients to understand what they want from our online content and tools. This allows us to develop the most useful content for our users and ensure that it is organised to make it easy for them to navigate through and find resolution. From our research we know that clients' most common priority is to find information to help them understand their rights, followed

<sup>27</sup> These figures refer to the annual change from 2014/15 to 2015/16.

<sup>28</sup> Page views from [www.citizensadvice.org.uk](http://www.citizensadvice.org.uk) for 1st April 2015 - 31st March 2016.

by being able to access how-to guides to help them solve their issues themselves. They have found checklists a popular way to solve their problems.

Based on our research we have recently developed a new online budgeting tool<sup>29</sup> shown in Figure 6 to help clients understand what they are earning and spending and where they may be able to cut costs. We tested the tool with users and it is already being used by someone every four minutes. In particular, it can support users who are being affected by the introduction of Universal Credit to manage their finances more effectively.

**Figure 6: Citizens Advice Budgeting Tool**

The screenshot shows the 'Work out your budget' section of the Citizens Advice website. At the top, there's a blue header bar with the 'citizens advice' logo and a navigation menu with links like Benefits, Work, Debt and money, Consumer, Relationships, Housing, Law and rights, Discrimination, Tax, Healthcare, Education, and More. Below the header, a breadcrumb trail shows the user has navigated from England > Debt and money > Budgeting > Work out your budget > Work out your budget. The main title 'Work out your budget' is in large blue text. The 'Income' section is currently selected, indicated by a grey background. It contains several input fields for different types of income, each with a monthly dropdown selector. To the right of these fields is a numbered list from 1 to 10, corresponding to various budget categories: 1. Income, 2. Benefits, 3. Debts you're paying back, 4. Bills, 5. Household and personal, 6. Family and pets, 7. Leisure, 8. Transport, 9. Car or other vehicle, and 10. Savings and investments. At the bottom left is a 'Next >' button.

We have also developed other tools to help consumers manage their finances, such as an Employment Support Allowance tool as part of our new approach to digital

<sup>29</sup>This and all other Citizens Advice online tools have been built in a way they that could be provided as white label to other websites. See the budgeting tool [here](#).

advice.<sup>30</sup> We know that almost half (48%) of visitors to the debt and money sections of our website are accessing them through their mobile phones. This means it is critical that all content and tools are optimised for access through mobiles and tablet devices. This fits with our approach throughout this response that guidance services that should be designed to engage consumers and fit in with their lives and behaviours.

## **Q15. Which content on the MAS website is most useful for consumers?**

As discussed earlier in Q7, it is important to be able to measure outcomes from guidance provisions. To know if content is truly useful we would need to see meaningful outcomes data about what actions consumers have undertaken after visiting the site. Without this we can only make general comments and experiences in relation to our own site.

We select specific content in Q16 which we believe should be maintained. In general, MAS provides some useful tools, video content and information. In general, some content is much more useful than others.

Having said this, we believe resources should be better focused to deliver the maximum benefit to most consumers. The website currently has a tendency to dedicate a large body of resources to certain complex topic areas, such as investment in funds and divorce. These resources are very dense in information and a lot of effort is put into developing resources for very technical areas that the average client will not look at - this effort is not then made cost-effective by using the resources in different topics.

Conversely, some areas – benefits is a good example of this – are both very small, and lack almost any unique resources targeted to that specific issue that aren't found elsewhere (in Budgeting, for example).

It is clear that a large amount of content on the site has very limited use to the average Citizens Advice client, and there are large gaps of provision in some areas where a Citizens Advice client might expect more information and support.

Much of the useful 'flat content' is duplicated elsewhere and we address this and the unique nature of this content in Q16.

The MAS website has full provision in the Welsh language<sup>31</sup> which is a key strength in comparison to other websites. It is important for consumers in Wales that Welsh language content is preserved - ideally this would be transferred to other appropriate websites.

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<sup>30</sup> The ESA tool is [here](#) and our new approach to digital advice is [here](#).

<sup>31</sup> MAS, <https://www.moneyadviceservice.org.uk/cy>.

On a technical level, the usefulness of MAS content to other providers will be determined by how it has been developed. Every website is a unique ecosystem, so depending on the build or coding of MAS content it may be easier for other providers to redevelop it rather than integrate it. With this in mind, MAS should consider focusing the £3.9 million it has allocated for website hosting, user experience, testing, maintenance and product development on ensuring that its key content can be smoothly transferred to other websites beginning immediately. This will ensure that consumers have access to information and tools throughout the transition to the new public guidance body.<sup>32</sup>

#### **Q16. Which content on the MAS website is it necessary to maintain because it is not provided elsewhere?**

As above in Q15, a key priority must be to ensure that consumers have access to online support throughout the transition process to the new money guidance body. To achieve this, work must start as soon as possible to transfer useful content to other sites.

The majority of MAS' web content is provided elsewhere. The Farnish Review, for example, found that 96% of its content was also covered by the Citizens Advice website.<sup>33</sup> Our recent analysis of the MAS website shows that of around 900 resources, roughly one in seven represent discrete financial capability resources.<sup>34</sup> The remainder are purely factual or signposting, and are generally already addressed by other websites such as [www.citizensadvice.co.uk](http://www.citizensadvice.co.uk).

The discrete financial capability resources are of a mixed quality: none are poor, but just under half are of a very high standard. Certain areas are unique to the MAS website, such as cars, travel, certain complex aspects of homes and mortgages that address a diversity of clients, several sections of the saving and investing resources, and a scattered selection of pages throughout the other seven areas of the website. However, in the coming months, Citizens Advice is very likely to produce information that makes much of this content obsolete.

So tools and videos are likely to be the unique content that should be maintained. MAS provides a broad range of high-quality tools. Many of these do not have equivalents elsewhere, and are often referred to within existing Citizens Advice resources as recommended examples or tools to use.

We have been making huge changes in our digital work, and have revolutionised the way we offer our online information to our clients, working closely with the Government Digital Service. We have ambitions to build on our progress and positive client feedback so far, and go on to expand our content and become a source of white-labelled content for other providers, which have the capability to do.

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<sup>32</sup> Money Advice Service, [Business Plan 2016/17](#).

<sup>33</sup> Christine Farnish, [Review of the Money Advice Service](#), December 2014, page 77.

<sup>34</sup> Our analysis of 898 resources found that 28 represent discrete financial capability resources.

We would welcome the opportunity to discuss which of the current content we could use, white label and host for others. With 36 million visits to our site each year, including over 7 million looking at our debt money content, we are ideally placed to ensure maximum client reach for the levy funding used in this area.

**Figure 7: Citizens Advice analysis of MAS tools**

Tool	Notes
<b>Highly recommended</b>	
<a href="#">Mortgage affordability calculator</a>	
<a href="#">Mortgage calculator</a>	
<a href="#">Loan Calculator</a>	
<a href="#">Divorce and separation calculator</a>	
<a href="#">Savings calculator</a>	Used in DMC
<a href="#">Baby costs calculator</a>	
<a href="#">Money stretcher calculator</a>	
<a href="#">Credit Card Calculator</a>	
<a href="#">Debt test</a>	Used in DMC
<a href="#">Cost of childcare calculator</a>	Used in DMC
<a href="#">Workplace pension contribution calculator</a>	
<a href="#">Christmas savings calculator</a>	
<a href="#">Budget planner</a>	Now have Citizens Advice equivalent
<a href="#">Money Health Check</a>	Used in DMC
<b>Recommended</b>	
<a href="#">Pension calculator</a>	Should be of interest to new pension body
<b>Of limited use</b>	
<a href="#">Stamp Duty calculator</a>	
<a href="#">Workplace pension advice tool</a>	New body should consider improving this
<b>Not recommended</b>	
<a href="#">Car costs calculator</a>	
<a href="#">Estimate what you need to save for retirement</a>	

## Annex 1: Illustration of potential components for overall options comparison

Pension Option	Charges	Tax Free lump Sum	Monthl y Income	Lump Sum (after tax)	Impact on retirement provision
<b>1 - Leave pension untouched</b>	£0	£0	£0	£0	<i>Annual increase for each year pension left untouched</i>
<b>2 - Get a secure Income</b>	£2,500	£0	£1,480	£0	<i>Secured income slightly lower than insecure income</i>
<b>3 - Get a flexible income</b>	£2,500	£0	£1,670	£0	<i>Highest possible income option, but not guaranteed</i>
<b>4 - Cash in whole pot</b>	£2,500	£25,000	£0	£78,000	<i>No ongoing income</i>
<b>5 - Cash in chunks</b>	£2,500	25,000	£1,230	£0	
<b>6 - Mix options</b>	£2,500	25,000	£1,230	£0	

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Published June 2016

Citizens Advice is an operating name of The National Association of Citizens Advice Bureaux. Registered charity number 279057.